

EXHIBIT A

STONE HILTON

Office of the Attorney General
Open Records Division
P.O. Box 12548
Austin, TX 78711
publicrecords@oag.texas.gov

via email

November 27, 2024

Re: Public Information Request

To Whom It May Concern:

Pursuant to the Texas Public Information Act, Chapter 552 of the Texas Government Code, we request the following public records:

- (1) All communications or records of any kind, including all notes, email communications, emails, email attachments, complete email chains, calendar, calendar invitations, calendar invitation attachments, text messages, iMessages, electronic messages on messaging platforms such as Slack, Skype, X's direct messages, Microsoft Teams, Signal, Telegram, WhatsApp, Confide, Parler, Facebook Messenger, or similar programs, made by, sent by, received by, or copied (blind or otherwise) to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, or Michelle Price, including any other employee, independent contractor, assistant, or deputy of these individuals, or any scheduler, assistant, administrative professional, or other person communicating or purporting to communicate on behalf of or to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, or Michelle Price, regarding any contemplated, planned, proposed, approved, or rejected salary increases, raises, bonuses, or additional compensation of any kind proposed for or paid to any of the above-listed individuals.



TEXAS LITIGATORS
600 Congress Ave., Suite 2350, Austin, TX 78701
737-465-3897

- (2) All communications or records of any kind, including copies of contracts and policies, and further including all notes, email communications, emails, email attachments, complete email chains, calendar, calendar invitations, calendar invitation attachments, text messages, iMessages, electronic messages on messaging platforms such as Slack, Skype, X's direct messages, Microsoft Teams, Signal, Telegram, WhatsApp, Confide, Parler, Facebook Messenger, or similar programs, made by, sent by, received by, or copied (blind or otherwise) to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Michelle Price, George Lane, Tommy Tran, or any individual working in the Facilities and Asset Management Division or any Law Enforcement Division (including Criminal Investigations, Cyber Safety, Gang Resources & Training, Human Trafficking, the Medicaid Fraud Control Unit, or the Cold Case and Missing Persons Unit), including any other employee, independent contractor, assistant, or deputy of these individuals, or any scheduler, assistant, administrative professional, or other person communicating or purporting to communicate on behalf of or to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Michelle Price, George Lane, Tommy Tran, or any individual working in the Facilities and Asset Management Division or any Law Enforcement Division (including Criminal Investigations, Cyber Safety, Gang Resources & Training, Human Trafficking, the Medicaid Fraud Control Unit, or the Cold Case and Missing Persons Unit), regarding the usage of OAG-owned vehicles or property by Brent Webster or any individual operating a vehicle or using other state property on Brent Webster's behalf or to transport Brent Webster to any location, including any contract or policy authorizing such use or operation, or any records identifying the costs associated with such use or operation.
- (3) All communications or records of any kind, including copies of contracts and policies, and further including all notes, email communications, emails, email attachments, complete email chains, calendar, calendar invitations, calendar invitation attachments, text messages, iMessages, electronic messages on messaging platforms such as Slack, Skype, X's direct messages, Microsoft Teams, Signal, Telegram, WhatsApp, Confide, Parler, Facebook Messenger, or similar programs, made by, sent by, received by, or copied (blind or otherwise) to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Aaron Nielson, or Michelle Price, including any other employee, independent contractor, assistant, or deputy of these individuals, or any scheduler, assistant, administrative professional, or other person communicating or purporting to communicate on behalf of or to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Aaron



Nielson, or Michelle Price, regarding any criminal investigation into Brent Webster, whether state or federal, and including any records or contracts authorizing Brent Webster's use of agency resources for his personal criminal defense or authorizing his reimbursement for legal expenses incurred in connection with or related to any criminal investigation into Brent Webster, or any requests for such authorizations and any communications related to such requests, whether approved or denied.

- (4) All communications or records of any kind, including all notes, email communications, emails, email attachments, complete email chains, calendar, calendar invitations, calendar invitation attachments, text messages, iMessages, electronic messages on messaging platforms such as Slack, Skype, X's direct messages, Microsoft Teams, Signal, Telegram, WhatsApp, Confide, Parler, Facebook Messenger, or similar programs, made by, sent by, received by, or copied (blind or otherwise) to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Aaron Nielson, Ryan Walters, or Michelle Price, including any other employee, independent contractor, assistant, or deputy of these individuals, or any scheduler, assistant, administrative professional, or other person communicating or purporting to communicate on behalf of or to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Aaron Nielson, Ryan Walters, or Michelle Price, regarding travel to or attendance at the 2024 Federalist Society National Lawyers Convention, the 2024 America First Policy Institute Gala, or the 2024 CPAC Investor Summit, by any OAG employee, including but not limited to planning, coordination, agendas, or requests for reimbursement of all or part of the expense associated with such trip, including registration fees, transportation, lodging, meals, or alcohol.
- (5) All communications or records of any kind, including copies of contracts and policies, and further including all notes, email communications, emails, email attachments, complete email chains, calendar, calendar invitations, calendar invitation attachments, text messages, iMessages, electronic messages on messaging platforms such as Slack, Skype, X's direct messages, Microsoft Teams, Signal, Telegram, WhatsApp, Confide, Parler, Facebook Messenger, or similar programs, made by, sent by, received by, or copied (blind or otherwise) to Brent Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Aaron Nielson, or Michelle Price, including any other employee, independent contractor, assistant, or deputy of these individuals, or any scheduler, assistant, administrative professional, or other person communicating or purporting to communicate on behalf of or to Brent



Webster, Ralph Molina, Josh Reno, Austin Kinghorn, Lesley French, Aaron Nielson, or Michelle Price, using any of the following terms:

- a. Realpage (or any derivative or abbreviation thereof)
- b. Stone Hilton
- c. Trump (or variants and shorthands, such as DJT)
- d. Transition
- e. Election (or variants, such as re-election)
- f. Mar-a-Lago (or variants, such as MAL, Mar a Lago, or similar)
- g. Pardon
- h. Western District (or W.D. Tex., or WDTX, or similar commonly used shorthands)
- i. Settle (or settlement)
- j. Partner
- k. Eric Hudson (or shorthands, such as Hudson)
- l. Terrazas
- m. Gaines West (or shorthands, such as Gaines)
- n. West Webb
- o. Tortious Interference (or interference)
- p. Ryan Fisher (or shorthands, such as Fisher)
- q. Embargo
- r. Blackball (or shorthands or variations)
- s. Federalist Society (or shorthands or variations, such as Fed Soc or fedsoc)
- t. America First Policy Institute (or shorthands or variations, such as AFPI)
- u. CPAC
- v. Buzbee

With respect to each of our requests, we seek all responsive records from December 1, 2023 through the date of your search regardless of format, medium, or physical characteristics, and regardless of whether the same or materially similar documents are produced by more than one individual. Please understand the term “record” in the broadest possible sense—including any written, typed, recorded, graphic, printed, audio, or video material, and further including any material that might otherwise be subject to a regular deletion or records-retention policy (*e.g.*, a policy on Microsoft Teams not to retain messages for longer than 30 days). We seek every available form of record of every kind included in the above: letters, email communications, email attachments, audio or video recordings, voicemail messages, transcripts, notes, summaries, minutes, or memoranda, including those regarding



telephone conversations, meetings, or discussions. We further seek any attachment to any responsive record.

If our request calls for a large number of records, we are prepared to work with you to craft appropriate search terms to limit this request in a manageable way. That said, we insist that you ask each potential custodian of any and all relevant records to search for those records, as any given governmental employee may lack access to all relevant records, such as those contained in paper format, in personal email accounts, outside of network drives, and so forth. Please specifically direct that all relevant custodians search **any and all personal email accounts and personal communications devices and phones**; records sent via these means are plainly records for purposes of the Texas Public Information Act. *See generally* Gov't Code § 552.002(a-2). **However, we are not requesting that OAG search Attorney General Ken Paxton's the personal accounts or devices.**

We are aware that Brent Webster and some (though not all) OAG employees believe that messages written in Teams or other software that has an auto-deletion feature are not required to be produced in response to such requests. Please prevent the deletion of any responsive messages in the event that a dispute arises regarding whether the Public Information Act requires the retention or release of such messages. We are likewise aware that Brent Webster and some (though not all) OAG employees fail to search for or turn over relevant records when generated on their personal devices. Please ensure the collection—and prevent the deletion—of any responsive records on personal devices in the event that a dispute arises regarding whether the Public Information Act requires the release of such messages, as it plainly does.

If you believe that otherwise responsive records have been destroyed, deleted, or not retained either because of their inherently transitory character or due to a regularly administered records-retention policy, please describe these documents to the best of your ability, any efforts you have taken to attempt to recover these records, and the full text of any such policy by which such records are either not maintained or retained. Likewise, please take all appropriate steps to ensure any records responsive to this request are not deleted, destroyed, or otherwise not retained by your office before completing this request. This may include pausing or suspending routine records-deletion policies. Please suspend these policies until this request is processed to the same extent that you would for a litigation hold on similar records.



If you believe that one or more otherwise responsive documents are exempt from disclosure in whole or part, please state specifically as to each document what document exists and why you believe it to be exempt from disclosure in whole or part. If you believe that a document contains both exempt and non-exempt components, please disclose the non-exempt components promptly and state specifically as to each portion you believe to be exempt why you believe it to be exempt from disclosure. If you believe that the exempt and non-exempt segments of such a document are so intermingled such that it is impossible to disclose the non-exempt components, please state how such non-exempt materials are intermingled with exempt portions of the document. If you deny our request as to any document as a whole, please state specifically why it is impossible to disclose any portion of the document.

We welcome the opportunity to discuss this request with you in advance to ensure that the search for these documents is undertaken in both a thorough and efficient manner. We likewise request a waiver of fees associated with processing this request under Government Code section 552.267(a), as this request “is in the public interest because providing” the requested records will “primarily benefit[] the general public.” The requested records relate to potential mismanagement of the Office of the Attorney General for the personal benefit, financial or otherwise, of Brent Webster. (For the avoidance of doubt, we are not aware of any information to suggest, nor do we believe, that Attorney General Ken Paxton is in any way involved in, or even aware of, any such potential mismanagement.) If you do not intend to grant our request for a fee waiver, please notify us of any fees or costs greater than \$100 prior to incurring such fees or costs.

To reduce costs, we request that you produce all responsive documents in an electronic format to the greatest extent possible. Please transmit these documents via an electronic transfer service of your choice directed to the email address listed below, or via portable electronic storage medium to our office at 600 Congress Avenue, Suite 2350, Austin, Texas, 78701. If it will accelerate your production, please begin producing responsive records on a rolling basis via the most convenient and cost-effective format.

We look forward to working with you. We hope that a cooperative approach to producing these documents can prevent the need for a burdensome and unnecessary dispute in the future. Please contact us at the information provided below if you have any questions regarding any component of this request.



Thank you for your time and attention to our requests.

Very Truly Yours,

/s/ Judd E. Stone II

Judd E. Stone II

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